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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,	)	
	)	Case No.: 2:14-CR-329-JCM-GWF
Plaintiff,	)	
	)	GOVERNMENT'S MOTION TO RELEASE
vs.	)	DEFENDANT FROM DETENTION AND
	)	TO DISMISS PETITION FOR ACTION ON
RONALD GENE MORGAN,	)	CONDITIONS OF PRETRIAL RELEASE
	)	
Defendant.	)	

The United States, by and through Assistant United States Attorney Christina M. Brown, moves the Court to dismiss the Petition for Action on Conditions of Pretrial Release pending further investigation, and to release the defendant from custody subject to the conditions previously imposed. In support, the United States provides as follows:

1. On February 18, 2015, Pretrial Services filed a Petition for Action on Conditions of Pretrial release alleging that on February 5, 2015, the defendant contacted D.M., a victim/potential witness contrary to the conditions of his release. (Doc. 16) Pretrial filed the Petition based on information received from the undersigned and law enforcement that on February 5, 2015, this victim received an email from the same email account the defendant used to communicate with her during the course of the fraudulent scheme. When the victim clicked on a link contained in the email, the word "attack" appeared and shut the computer down.

1           2.     On February 23, 2015, the defendant made his initial appearance before  
2 Magistrate Leen on the Petition. The United States moved for detention, arguing that the email  
3 was received five days after the defendant's initial appearance on the indictment, during which  
4 the undersigned made statements that would have alerted the defendant to the victim's  
5 cooperation with law enforcement. Additionally, in a 2012 email to the victim after the victim  
6 filed a federal complaint regarding her investment, the defendant threatened that he knew where  
7 the victim lived, had her personal identification information, and that if she attempted to put  
8 him in jail he would "take [her and her family] down" and "ruin [her] life." The undersigned  
9 represented that forensic analysis of the victim's computer was continuing and that information  
10 would be provided upon its receipt. The Court ordered the defendant held pending a revocation  
11 hearing scheduled for March 12, 2015, before Magistrate Ferenbach.

12           3.     On today's date, the undersigned spoke with the FBI forensic computer  
13 examiner, who reported that his continued investigation has revealed that the email the victim  
14 received displaying the defendant's email address may have originated in Brazil or Morocco.  
15 Absent additional investigation, including MLATs to obtain evidence, the examiner cannot  
16 conclusively state whether the email was caused by the defendant or another source spoofing  
17 the defendant's email address.

18 ///

1 WHEREFORE, the United States moves the Court to dismiss the Petition for Action on  
2 Conditions of Pretrial Release and to order the defendant's release from detention under the  
3 terms and conditions previously imposed.

4 DATED: March 3, 2015.

5 Respectfully Submitted,

6 DANIEL G. BOGDEN  
7 United States Attorney

8 /s/ Christina M. Brown  
9 Christina M. Brown  
Assistant United States Attorney  
District of Nevada

10  
11 CERTIFICATION OF SERVICE

12 The foregoing was served on counsel of record by electronic case filing this the 3<sup>rd</sup> day  
13 of March, 2015.

14 /s/ Christina M. Brown  
Christina M. Brown

15 SO ORDERED:

16  
17   
18 \_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE

19 Dated this 3<sup>rd</sup> day of March, 2015

20  
21 IT IS HEREBY ORDERED that the Revocation of Pretrial Release set for March 12, 2015 at 2:00 p.m. is  
22 VACATED.  
23  
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